



Louisville Metro Air Pollution Control District
701 West Ormsby Avenue, Suite 303
Louisville, Kentucky 40203-3137



Federally Enforceable District Origin Operating Permit (FEDOOP)

Permit No.: O-0601-19-F (R1)

Plant ID: 0601

Effective Date: 4/1/2019

Expiration Date: 3/31/2024

Revision Date: 3/17/2021

Permission is hereby given by the Louisville Metro Air Pollution Control District to operate the process(es) and equipment described herein which are located at:

Source: Hood Container Louisville
1121 West Kentucky Street
Louisville, KY 40210

Owner: Hood Container Corporation
1978 Hood Blvd Suite 325
Hattiesburg, MS 39403

The applicable procedures of District Regulation 2.17 regarding review by the U.S. EPA and public participation have been followed in the issuance of this permit. Based on review of the application on file with the District, permission is given to operate under the conditions stipulated herein. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than twelve (12) months and no later than ninety (90) days prior to the expiration date.

Emission limitations to qualify for non-major status:

Pollutant: VOC

Tons/year: < 25

Application No.: See **Application and Related Documents** table.

Public Notice Date: 05/30/2019

Permit writer: Yiqiu Lin

DocuSigned by:



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Air Pollution Control Officer
3/17/2021

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FEDOOP Permit Revisions/Changes

Permit No.	Public Notice Date	Issue Date	Change Type	Description/Scope
27713-13-F	2/8/2014	3/13/2014	Initial	Contains equipment found in District permits 270-87-E, 125-92-O, 136-96-O and 34160-12-C
O-0601-17-F	1/12/2017	2/20/2017	Admin.	Updated to current permit format and includes Name and Ownership change.
			Sig.	Remove single and total HAP limits as they do not need them and add PM10 limits to Plantwide Emission Unit to avoid being subject to STAR; addition of references to PM10 plantwide emission unit throughout. Updated General Condition 10. Added Permit Renewal-Related documents table.
O-0601-19-F	5/30/2019	7/15/2019	Renewal	Permit renewal; incorporated construction permit C-0601-19-0001-F for new flexo presses and cutter; addition of new I.A. gluer.
O-0601-19-F (R1)	N/A	3/17/2021	Admin.	Plant name change and ownership change

Construction Permit Summary

Permit No.	Issue Date	Description
270-87-C	10/19/1987	Operating permit for one (1) cyclone separator and paper baling system with associated duct work consisting of 5 ducts with inline blower/shredders and multiple pick-up stations from 4 flexographic presses, 1 shredding machine and 4 die cutters.
125-92-O	1/30/2003	Operating permit for a Flexographic printing operation using water-based inks with four (4) machines as follows: One (1) McKinley two-colors; one (1) Maramatsu one-color, and one (1) Hycor 4-color, for printing, cutting, and creasing; one (1) McKinley two-color, for printing, cutting, creasing, and gluing.
136-96-O	1/30/2003	Operating permit for a 4-color flexographic Printer, Martin, Flexocompact, Model No. 1224, and a Hooper/Swift 143 Flexographic printer, which also includes slotting, rotary die cutting, gluing, and folding processes.
34160-12-C	1/30/2012	Construction permit for one (1) 2-color 18,000 sheets/hr Latitude Flexographic Press.
C-0601-19-0001-F	5/28/2019	Construction permit for one (1) 3-color 10,000 sheets/hr flexographic press with cardboard gluing and cutting, one (1) 1,100 sheets/hr die cutter.

Application and Related Documents

Document Number	Date	Description
27713	5/4/2009	Original Application
57304	7/17/2013	Application to become STAR exempt, accept limits of 35 tpy of regulated air pollutant, 5 tpy of a HAP, and 12.5 tpy of combined HAPs.
78273	7/13/2016	Application for company name change
78275	7/13/2016	Certificate of Existence
96448, 96464	12/11/2018	FEDOOP renewal application submitted and District's receipt.
96837, 96873	1/25/2019 1/28/2019	Correspondences for site visit schedule
96958, 97016	2/1/2019 2/7/2019	Updated Form 100B for FEDOOP renewal submitted
191535	2/19/2021	Application 100A for name change

Abbreviations and Acronyms

AP-42	- AP-42, <i>Compilation of Air Pollutant Emission Factors</i> , published by U.S.EPA
APCD	- Louisville Metro Air Pollution Control District
BAC	- Benchmark Ambient Concentration
BACT	- Best Available Control Technology
Btu	- British thermal unit
CEMS	- Continuous Emission Monitoring System
CFR	- Code of Federal Regulations
CO	- Carbon monoxide
District	- Louisville Metro Air Pollution Control District
EA	- Environmental Acceptability
gal	- U.S. fluid gallons
GHG	- Greenhouse Gas
HAP	- Hazardous Air Pollutant
Hg	- Mercury
hr	- Hour
in.	- Inches
lbs	- Pounds
l	- Liter
LMAPCD	- Louisville Metro Air Pollution Control District
mmHg	- Millimeters of mercury column height
(M)SDS	- (Material) Safety Data Sheet
MM	- Million
NAICS	- North American Industry Classification System
NO _x	- Nitrogen oxides
PM	- Particulate Matter
PM ₁₀	- Particulate Matter less than 10 microns
PM _{2.5}	- Particulate Matter less than 2.5 microns
ppm	- parts per million
PSD	- Prevention of Significant Deterioration
psia	- Pounds per square inch absolute
QA	- Quality Assurance
RACT	- Reasonably Available Control Technology
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO ₂	- Sulfur dioxide
STAR	- Strategic Toxic Air Reduction
TAC	- Toxic Air Contaminant
UTM	- Universal Transverse Mercator
VOC	- Volatile Organic Compound
w.c.	- Water column
year	- Any period of twelve consecutive months, unless "calendar year" is specified
yr	- Year, or any 12 consecutive-month period, as determined by context

Preamble

This permit covers only the provisions of Kentucky Revised Statutes Chapter 77 Air Pollution Control, the regulations of the Louisville Metro Air Pollution Control District (District) and, where appropriate, certain federal regulations. The issuance of this permit does not exempt any owner or operator to whom it has been issued from prosecution on account of the emission or issuance of any air contaminant caused or permitted by such owner or operator in violation of any of the provisions of KRS 77 or District regulations. Any permit shall be considered invalid if timely payment of annual fees is not made. The permit contains general permit conditions and specific permit conditions. General conditions are applicable unless a more stringent requirement is specified elsewhere in the permit.

General Conditions

- G1. The owner or operator shall comply with all General Conditions herein and all terms and conditions in the referenced process/process equipment list.
- G2. All terms and conditions in this FEDOOP are enforceable by EPA, except those terms and conditions specified as District-only enforceable, and those which are not required pursuant to the Clean Air Act Amendments of 1990 (CAAA) or any of the Act's applicable requirements.
- G3. All application forms, reports, compliance certifications, and other relevant information submitted to the District shall be certified by a responsible official. If a change in the responsible official (RO) occurs during the term of this permit, or if an RO is added, the owner or operator shall provide written notification (Form AP-100A) to the District within 30 calendar days of such change or addition.
- G4. The owner or operator shall submit an annual compliance certification, signed by the responsible official, to the District, on or before April 15 of the year following the year for which the certification applies. This certification shall include completion of District Form 9440-O.
- G5. Periodic testing, instrumental monitoring, or non-instrumental monitoring, which may include record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstrating continuing compliance with the terms and conditions of this permit.
- G6. The owner or operator shall retain all records required by the District or any applicable requirement, including all required monitoring data and supporting information, for a period of five years from the date of the monitoring, sampling, measurement, report, or application, unless a longer time period for record retention is required by the District or an applicable requirement. Records shall be retrievable within a reasonable time and made available to the District, Kentucky Division for Air Quality, or the EPA upon request.

- G7. The owner or operator shall provide written notification to the District, and receive approval, prior to making any changes to existing equipment or processes that would result in emissions of any regulated pollutant in excess of the allowable emissions specified in this permit.
- G8. This permit may be reissued, revised, reopened, or revoked pursuant to District Regulation 2.17. Repeated violations of permit conditions are sufficient cause for revocation of this permit. The filing of a request by the owner or operator for any reissuance, revision, revocation, termination, or a notification of planned changes in equipment or processes, or anticipated noncompliance shall not alter any permit requirement.
- G9. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed either 10 tons per year, or such lesser quantity as the EPA has established by rule, of any one Hazardous Air Pollutant (HAP) or 25 tons per year of all HAPs combined. Fugitive HAP emissions shall be included in this limit. HAPs are listed in section 112(b) of the CAAA and as amended in 40 CFR 63, Subpart C.
- G10. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed 100 tons per year of any regulated pollutant, including particulate matter, PM₁₀, PM_{2.5}, sulfur dioxide, carbon monoxide, nitrogen oxides, lead, hydrogen sulfide, gaseous fluorides, total fluorides, or Volatile Organic Compounds (VOC); any pollutant subject to any standard in District Regulation 7.02; or any substance listed in sections 112(r), 602(a) and 602(b) of the CAAA. Fugitive emissions shall be included in these limits for source categories listed in District Regulation 2.16.
- G11. Unless specified elsewhere in this permit, the owner or operator shall complete required monthly record keeping within 30 days following the end of each calendar month.
- G12. Unless specified elsewhere in this permit, the owner or operator shall submit annual reports demonstrating compliance with the emission limitations specified. The report shall contain monthly and consecutive 12-month totals for each pollutant that has a federally enforceable limitation on the potential to emit. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement or a declaration that there were no such deviations. All annual compliance reports shall include the following per Regulation 2.17, section 3.5.
- A certification statement: "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete", and
 - The signature and title of a responsible official of the company.
- The report must be postmarked no later than March 1 of the year following the calendar year covered in the annual report.

G13. The owner or operator shall comply with all applicable requirements of the following federally enforceable District Regulations:

Regulation	Title
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance With Emissions Standards And Maintenance Requirements
1.06	Source Self-Monitoring, Emission Inventory Development and Reporting
1.07	Excess Emissions During Startups, Shutdowns, and Upset Conditions
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
1.18	Rule Effectiveness
1.19	Administrative Hearings
2.01	General Application (Permit Requirements)
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Authorization to Construct or Operate; Demolition/Renovation Notices and Permit Requirements
2.04	Construction or Modification of Major Sources in or Impacting Upon Non-Attainment Areas (Emission Offset Requirements)
2.05	Prevention of Significant Deterioration
2.06	Permit Requirements – Other Sources
2.07	Public Notification for Title V, PSD, and Other Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Modification, Revocation, or Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
3.01	Ambient Air Quality Standards
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.04	Particulate and Sulfur Dioxide Reduction Requirements
4.05	Hydrocarbon and Nitrogen Oxides Reduction Requirements
4.06	Carbon Monoxide Reduction Requirements
4.07	Episode Reporting Requirements
6.01	General Provisions (Existing Affected Facilities)
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (New Affected Facilities)

- G14. The owner or operator shall comply with all applicable requirements of the following District-only enforceable regulations:

Regulation	Title
1.12	Control of Nuisances
1.13	Control of Objectionable Odors
2.08	Emission Fee, Permit Fees and Permit Renewal Procedures
2.17	Federally Enforceable District Origin Operating Permits
5.00	Definitions
5.01	General Provisions
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants
5.14	Hazardous Air Pollutants and Source Categories
5.15	Chemical Accident Prevention Provisions
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant
5.21	Environmental Acceptability for Toxic Air Contaminants
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant
5.23	Categories of Toxic Air Contaminants
7.02	Adoption and Incorporation by Reference of Federal New Source Performance Standards

- G15. The owner or operator shall submit emission inventory reports, as required by Regulation 1.06, if so notified by the District.
- G16. The owner or operator shall submit timely reports of abnormal conditions or operational changes that may cause excess emissions, as required by Regulation 1.07.
- G17. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit shall be submitted to:

***Air Pollution Control District
701 W. Ormsby Avenue, Suite 303
Louisville, Kentucky 40203-3137***

Plantwide Requirements

Applicable Regulations

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
2.17	Federally Enforceable District Origin Operating Permits	1 through 9

Plantwide Specific Conditions

S1. Standards

[Regulation 2.17, section 5.1]

a. PM/PM₁₀/PM_{2.5}

- i. The owner or operator shall not allow or cause total plantwide PM/PM₁₀/PM_{2.5} emissions to equal or exceed 25 tons during any consecutive 12-month period.¹
[Regulation 5.00, section 1.13.5]

b. VOC

- i. The owner or operator shall not allow or cause total plantwide VOC emissions to equal or exceed 25 tons during any consecutive 12-month period.¹
[Regulation 2.17, section 5.1] [Regulation 5.00, section 1.13.5]

S2. Monitoring and Record Keeping

[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of 5 years and make the records readily available to the District upon request.

a. PM/PM₁₀/PM_{2.5}

- i. The owner or operator shall, monthly, calculate and record the plantwide total emissions for PM/PM₁₀/PM_{2.5} for each month and the previous 12-consecutive month period.

¹ The source accepted 25 tons per year emission limit for VOC and PM₁₀ to become a STAR-exempt FEDOOP source.

b. VOC

- i. The owner or operator shall, monthly, calculate and record the plantwide total emissions for VOC for each month and the previous 12-consecutive month period.

S3. Reporting

[Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition G12:

a. PM/PM₁₀/PM_{2.5}

- i. The owner or operator shall report the calendar month and the 12-consecutive month plantwide total emissions for PM/PM₁₀/PM_{2.5} for each month in the reporting period.

b. VOC

- i. The owner or operator shall report the calendar month and the consecutive 12-month plantwide VOC emissions for each month in the reporting period.

Emission Unit U1: Flexographic Printing Presses**Applicable Regulations**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
6.29	Standard of Performance for Graphic Arts Facilities Using Rotogravure or Flexographic Printing	All
7.08	Standards of Performance for New Process Operations	1 - 3

Equipment

Emission Point	Description	Install Date	Applicable Regulations	Control ID	Release ID
E1	One (1) 2-color flexographic press, make McKinley, rated 10,000 sheets/hr, print area 66"x170", with cardboard cutting	1992	6.29, 7.08	N/A	F*
E2	One (1) 4-color flexographic press, make Hycorr, rated 10,000 sheets/hr, print area 66" x 130", with cardboard cutting	1992	6.29, 7.08	N/A	F
E3	One (1) 2-color flexographic press, make McKinley, rated 10,000 sheets/hr, print area 66" x 115", with cardboard gluing and cutting	1992	6.29, 7.08	N/A	F
E5	One (1) 2-color flexographic press, make Latitude, rated 18,000 sheets/hr, print area 25" x 70", with cardboard gluing and cutting	2011	6.29, 7.08	N/A	F
E30	One (1) 3-color flexographic press, make Ward, model 12000, rated 10,000 sheets/hr, print area 50" x 110", with cardboard gluing and cutting	2018	6.29, 7.08	N/A	F
* F - fugitive emissions.					

Control Devices:

There are no control devices associated with this equipment.

U1 Specific Conditions

S1. Standards

[Regulation 2.17, section 5.1]

a. Opacity

- i. The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. [Regulation 7.08, section 3.1.1]

b. PM/PM₁₀/PM_{2.5}

- i. See Plantwide emission unit.
- ii. The owner or operator shall not allow PM emissions to exceed 2.34 lb/hr for each press based on actual operating hours in a calendar day.² [Regulation 7.08, section 3.1.2]

c. VOC

- i. See Plantwide emission unit.
- ii. The owner or operator shall not cause or allow the emission of VOCs from any affected facility (E1, E2, E3, E5, and E30) unless at least one of the following requirements is met:³ [Regulation 6.29, section 3.1]
 - (1) The volatile fraction of all inks and coatings, as applied to the substrate, used on the affected facility shall contain no more than 25% VOC by volume, [Regulation 6.29, section 3.1.1]
 - (2) The non-volatile fraction, minus water and exempt solvents, of all inks and coatings, as applied to the substrate, used on the affected facility shall be at least 60% by volume, [Regulation 6.29, section 3.1.2]
 - (3) All inks and coatings, as applied to the substrate, used on the affected facility shall contain no more than 0.5 pound of VOC per pound of solids, [Regulation 6.29, section 3.1.3] or
 - (4) The VOC emissions shall not exceed 40% by weight of the VOC net input into the affected facility.[Regulation 6.29, section 3.1.4.3]

² A one-time PM compliance demonstration was performed for this equipment and the lb/hr standards cannot be exceeded uncontrolled for any piece of equipment in this emission unit. Therefore, there are no monitoring, record keeping, or reporting requirements with respect to the PM lb/hr limits.

³ The source can show compliance with Regulation 6.29, section 3.1.3 with inks and coatings containing less than 25% VOC by volume.

- iii. Compliance with the requirements shall be based upon the inks and coatings, as applied, used by the affected facility during a calendar-month averaging period.⁴ [Regulation 6.29, section 3.2]
- iv. If more than one requirement would be applicable for a specific affected facility, then the least stringent requirement shall apply. [Regulation 6.29, section 3.3]

S2. Monitoring and Record Keeping

[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

a. Opacity

- i. The owner or operator shall, monthly, conduct a one-minute visible emissions survey, during normal operation, of the emission points. No more than four emission points shall be observed simultaneously. The opacity surveys may be performed on the building exhaust points if the process is inside an enclosure.
- ii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation.
- iii. The owner or operator shall, monthly, maintain records of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

b. PM/PM₁₀/PM_{2.5}

- i. See Plantwide emission unit.
- ii. There are no monitoring or record keeping requirements for this equipment with respect to the lb/hr PM emission limit.

⁴ The District has authorized an averaging period of calendar-month according to Regulation 6.29, section 3.2.

c. VOC

- i. See Plantwide emission unit.
- ii. The owner or operator of an affected facility subject to this regulation shall maintain records of operations for the approved averaging period for the most recent five-year period. The records shall be made available to the District, the Cabinet, and the EPA upon request. The records shall include, but not be limited to, the following: [Regulation 6.29, section 6.1]
 - (1) The regulation and section number applicable to the affected facility for which the records are being maintained,
 - (2) The application method and substrate type (metal, plastic, etc.),
 - (3) The amount and type of each ink, coating, and solvent used at each point of application, including exempt compounds, during the averaging period.
 - (4) The VOC content as applied in each ink, coating and solvent,
 - (5) The date for each application of each ink, coating, and solvent.
- iii. The owner or operator shall maintain a copy of the material safety data sheets (MSDS) for each VOC containing material used at the facility.

S3. Reporting

[Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition G12:

a. Opacity

- i. Emission Unit number and Emission Point number for each exceedance;
- ii. The beginning and ending date of the reporting period;
- iii. The number of surveys where visible emissions were observed;
- iv. The date, time, and results of each Method 9 that exceeded the opacity standard; and
- v. Description of any corrective action taken for each exceedance.

b. PM/PM₁₀/PM_{2.5}

- i. See Plantwide emission unit.
- ii. There are no reporting requirements for this equipment with respect to the lb/hr PM emission limit.

c. VOC

- i. See Plantwide emission unit.

Emission Unit U2: Cardboard and Foam Processing Equipment**Applicable Regulations**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
7.08	Standards of Performance for New Process Operations	1 - 3

Equipment

Emission Point	Description	Install Date	Applicable Regulations	Control ID	Release ID
E8	One (1) horizontal foam saw, make Gelma, model 0579, capacity: 15 sheets/hr	2009	7.08	C1	S1
E9	One (1) cardboard baler with process cyclone, make Maren 720E, model 0025, capacity: 3 tons/hr	1987	7.08	N/A	F
E31	One (1) corrugated cardboard cutter, make Baysek, model C170, capacity 1,100 sheets/hr	2015	7.08	N/A	F
* F - fugitive emissions.					

Control Devices:

Control ID	Description	Control Efficiency	Performance Indicator
C1	One (1) barrel top dust collector	75% ⁵	N/A

⁵ This is the District-approved default control efficiency, used in the absence of specific control device efficiency testing.

U2 Specific Conditions

S1. Standards

[Regulation 2.17, section 5.1]

a. Opacity

- i. The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. [Regulation 7.08, section 3.1.1]

b. PM/PM₁₀/PM_{2.5}

- i. See Plantwide emission unit.
- ii. The owner or operator shall not allow PM emissions to exceed 2.34 lb/hr for the horizontal foam saw (E8) based on actual operating hours in a calendar day.⁶ [Regulation 7.08, section 3.1.2]
- iii. The owner or operator shall not allow PM emissions from the baler (E9) to exceed 4.86 tpy.⁷ [Permit 270-87-C, Effective 10/19/1987]
- iv. The owner or operator shall not allow PM emissions to exceed 2.80 lb/hr for the die cutter (E31) based on actual operating hours in a calendar day.⁶ [Regulation 7.08, section 3.1.2]

S2. Monitoring and Record Keeping

[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

a. Opacity

- i. The owner or operator shall, monthly, conduct a one-minute visible emissions survey, during normal operation, of the emission points. No more than four emission points shall be observed simultaneously. The opacity surveys may be performed on the building exhaust points if the process is inside an enclosure.
- ii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial

⁶ A one-time PM compliance demonstration was performed for this equipment and the lb/hr standards cannot be exceeded uncontrolled. Therefore, there are no specific monitoring, record keeping, or reporting requirements for E8 and E31 with respect to the PM lb/hr limits.

⁷ The District believes that the 6,400 hours-of-operation will ensure that the PM emissions are less than 4.86 tons during the 12 consecutive month period. Therefore, in lieu of calculating PM emissions, the company can easily demonstrate compliance if the baler operates less than 6,400 hours during the 12 month consecutive period.

observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation.

- iii. The owner or operator shall, monthly, maintain records of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

b. PM/PM₁₀/PM_{2.5}

- i. See Plantwide emission unit.
- ii. For the horizontal foam saw (E8), the owner or operator shall monthly perform a visual inspection of the structural and mechanical integrity of the dust collector for signs of damage, air leakage, corrosion, or other equipment defects, and repair and/or replace defective components as needed. The owner or operator shall maintain monthly records of the results.
- iii. For the baling operation (E9), the owner or operator shall, monthly, record the total hours of operation of and calculate the total hours of operation for the 12 consecutive month period.
- iv. The owner or operator shall demonstrate compliance by demonstrating that the hours of operation of the baler are less than 6,400 hours during the 12 consecutive month period. If the hours of operation exceed 6,400 hours per 12-month period, the owner or operator shall calculate the PM emissions during the 12 consecutive month period to demonstrate compliance.⁷

S3. Reporting

[Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition G12:

a. Opacity

- i. Emission Unit number and Emission Point number for each exceedance;
- ii. The beginning and ending date of the reporting period;

- iii. The number of surveys where visible emissions were observed;
- iv. The date, time, and results of each Method 9 that exceeded the opacity standard; and
- v. Description of any corrective action taken for each exceedance.

b. PM/PM₁₀/PM_{2.5}

- i. See Plantwide emission unit.
- ii. The owner or operator shall report any periods of exceeding the PM emission standard for the baler (E9).
- iii. There are no reporting requirements for this equipment with respect to the lb/hr PM emission limits for horizontal foam saw (E8) and die cutter (E31).

Insignificant Activities

Equipment	Qty.	PTE (tpy)	Regulation Basis
36" band saw (See unit IA1)	1	0.32 PM ₁₀	Regulation 1.02, section 1.38
Global splitter (See unit IA1)	1	0.11 PM ₁₀	Regulation 1.02, section 1.38
Universal belt splitter (See unit IA1)	1	0.11 PM ₁₀	Regulation 1.02, section 1.38
Thompson die cutter (See unit IA1)	1	2.67 PM ₁₀	Regulation 1.02, section 1.38
Vertical foam saw (See unit IA1)	1	1.27 PM ₁₀	Regulation 1.02, section 1.38
Foam band saw #1 (See unit IA1)	1	0.08 PM ₁₀	Regulation 1.02, section 1.38
Foam band saw #2 (See unit IA1)	1	0.08 PM ₁₀	Regulation 1.02, section 1.38
Atom foam die cutter (See unit IA1)	1	0.19 PM ₁₀	Regulation 1.02, section 1.38
Post folder/gluer (See unit IA2)	1	0.14 VOC	Regulation 1.02, section 1.38
Bulk laminator (See unit IA2)	1	0.13 VOC	Regulation 1.02, section 1.38
Hot melt roller #1 (See unit IA2)	1	0.10 VOC	Regulation 1.02, section 1.38
Hot melt roller #2 (See unit IA2)	1	0.10 VOC	Regulation 1.02, section 1.38
Pot Devin laminator #2124 (See unit IA2)	1	0.15 VOC	Regulation 1.02, section 1.38
Pot Devin Laminator #2125 (See unit IA2)	1	0.15 VOC	Regulation 1.02, section 1.38
Glue gun, Valco Melton (See unit IA2)	1	0.13 VOC	Regulation 1.02, section 1.38
Parts washer (See unit IA3) (cold solvent parts cleaners that are equipped with a functional secondary reservoir into which solvent drains during use)	1	0.32 VOC	Regulation 1.02, Appendix A
Oil storage drums (Storage of lubricating oils or fuel oils with a vapor pressure less than 10 mm Hg at conditions of 20°C and 760 mm of Hg)	10	5E-6 VOC	Regulation 1.02, Appendix A
Propane storage cylinders (pressurized storage vessel)	28	0	Regulation 1.02, Appendix A

1. Insignificant activities identified in District Regulation 1.02, Appendix A, may be subject to size or production rate disclosure requirements.
2. Insignificant activities identified in District Regulation 1.02, Appendix A shall comply with generally applicable requirements.
3. The owner or operator shall annually submit an updated list of insignificant activities that occurred during the preceding year, with the compliance certification due April 15th.
4. Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.

5. The owner or operator may elect to monitor actual throughputs for each of the insignificant activities and calculate actual annual emissions, or use Potential to Emit (PTE) as the annual emissions for each piece of equipment.
6. The District has determined that no monitoring, recordkeeping, or reporting requirements apply to the insignificant activities listed, except for the equipment that has an applicable regulation and permitted under an insignificant activity (IA) unit.

Emission Unit IA1: Miscellaneous Cardboard and Foam Cutting Equipment**Applicable Regulations**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
7.08	Standards of Performance for New Process Operations	1 - 3

Equipment

Emission Point	Description	Install Date	Applicable Regulations	Control ID	Release ID
E10	One (1) 36# cardboard band saw, make Wellsaw, model W20, capacity 100 sheets/hr	2009	7.08	N/A	F
E11	One (1) 120" cardboard splitter, make Global, model L-10-5, capacity 100 sheets/hr	2009	7.08	N/A	F
E12	One (1) cardboard belt splitter, make Universal, model M-1999, capacity 750 sheets/hr	2009	7.08	N/A	F
E13	One (1) flat cardboard die cutter, make Thompson, model ESL 2080, capacity 500 sheets/hr	2009	7.08	N/A	F
E15	One (1) vertical foam saw, make Edge Industries, model C1-3, capacity 15 sheets/hr	2009	7.08	N/A	F
E16	One (1) foam band saw #1, make Doall, model 3—HSV, capacity 34 foam pieces/hr	2009	7.08	N/A	F
E17	One (1) foam band saw #2, make Milwaukee Tool & Machine Company, model 119-23, capacity 34 foam pieces/hr	2009	7.08	N/A	F
E18	One (1) foam die cutter, make ATOM, model 300M, capacity 135 foam pieces/hr	2009	7.08	N/A	F
* F - fugitive emissions.					

Control Devices:

There are no control devices associated with this equipment.

IA1 Specific Conditions

S1. Standards

[Regulation 2.17, section 5.1]

a. Opacity

- i. The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. [Regulation 7.08, section 3.1.1]

b. PM/PM₁₀/PM_{2.5}

- i. See Plantwide emission unit.
- ii. The owner or operator shall not allow PM emissions to exceed the lb/hr standards as shown in the table below, based on actual operating hours in a calendar day.⁸ [Regulation 7.08, section 3.1.2]

Emission Point	Description	Reg. 7.08 PM Standards (lb/hr)
E10	One (1) 36# cardboard band saw	2.34
E11	One (1) 120" cardboard splitter	2.34
E12	One (1) cardboard belt splitter	2.34
E13	One (1) flat cardboard die cutter	2.34
E15	One (1) vertical foam saw	2.34
E16	One (1) foam band saw #1	2.34
E17	One (1) foam band saw #2	2.34
E18	One (1) foam die cutter	2.34

S2. Monitoring and Record Keeping

[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

a. Opacity

- i. The owner or operator shall, monthly, conduct a one-minute visible emissions survey, during normal operation, of the emission points. No more than four emission points shall be observed simultaneously. The

⁸ A one-time PM compliance demonstration was performed for each piece of equipment and the lb/hr standards cannot be exceeded uncontrolled. Therefore, there are no specific monitoring, record keeping, or reporting requirements for this unit with respect to the PM lb/hr limits.

opacity surveys may be performed on the building exhaust points if the process is inside an enclosure.

- ii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation.
- iii. The owner or operator shall, monthly, maintain records of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

b. PM/PM₁₀/PM_{2.5}

- i. See Plantwide emission unit.
- ii. There are no monitoring and record keeping requirements for this equipment with respect to the lb/hr PM emission limit.

S3. Reporting

[Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition G12:

a. Opacity

- i. There are no compliance reporting requirements for this equipment.

b. PM/PM₁₀/PM_{2.5}

- i. See Plantwide emission unit.
- ii. There are no reporting requirements for this equipment with respect to the lb/hr PM emission limit.

Emission Unit IA2: Miscellaneous Gluing Operations**Applicable Regulations**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
2.17	Federally Enforceable District Origin Operating Permits	1 through 9

Equipment

Emission Point	Description	Install Date	Applicable Regulations	Control ID	Release ID
E19	One (1) cardboard folder/gluer, make Post Machinery, model P956, capacity 500 sheets/hr	2009	2.17 ⁹	N/A	F
E21	One (1) cardboard bulk laminator, make Black Brothers, model 85208, capacity 50 sheets/hr	2009		N/A	F
E22	One (1) hot melt roller gluing machine #1, make Freeman, capacity 200 sheets/hr	2009		N/A	F
E23	One (1) hot melt roller gluing machine #2, make Freeman, capacity 200 sheets/hr	2009		N/A	F
E24	One (1) hand label laminators #2124, make Potdevin, model NTZ, capacity 150 sheets/hr	1987		N/A	F
E25	One (1) hand label laminators #2125, make Potdevin, capacity 150 sheets/hr	2009		N/A	F
E32	One (1) glue gun, make Valco Melton, model E4-E, capacity 50 sheets/hr	2016		N/A	F
* F - fugitive emissions.					

Control Devices:

There are no control devices associated with this equipment.

⁹ The total potential emissions for all pieces of equipment in this plant cannot exceed the 5 ton threshold required by Regulation 7.25. Therefore, Regulation 7.25 is not applicable. However, the emissions from this equipment need to be calculated in order to demonstrate compliance with the plantwide VOC limit of 25 tons per year.

IA2 Specific Conditions**S1. Standards**

[Regulation 2.17, section 5.1]

a. VOC

- i. See Plantwide emission unit.

S2. Monitoring and Record Keeping

[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

a. VOC

- i. See Plantwide emission unit.
- ii. The owner or operator shall, monthly, record the total amount of glue pellets used in pounds for each gluing operation and calculate the amount of glue pellets used during the 12 consecutive month period.

S3. Reporting

[Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition 12:

a. VOC

- i. See Plantwide emission unit.

Emission Unit IA3: Parts Washer**Applicable Regulations**

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
6.18	Standards of Performance for Solvent Metal Cleaning Equipment	1 through 4

Equipment

Emission Point	Description	Install Date	Applicable Regulations	Control ID	Release ID
E28	One (1) cold solvent parts washer, make Safety Kleen, equipped with a secondary reservoir, Capacity 25 gallons	2009	6.18	N/A	F
* F - fugitive emissions.					

Control Devices:

There are no control devices associated with this equipment.

IA3 Specific Conditions

S1. Standards

[Regulation 2.17, section 5.1]

a. VOC

- i. See Plantwide emission unit.
- ii. The owner or operator shall install, maintain, and operate the control equipment as follows: (Regulation 6.18, section 4)
 - (1) The cold cleaner shall be equipped with a tightly fitting cover that is free of cracks, holes, or other defect. If the solvent is agitated or heated, then the cover shall be designed so that it can be easily operated with one (1) hand. [Regulation 6.18, section 4.1.1]
 - (2) The cold cleaner shall be equipped with a drainage facility that is designed so that the solvent that drains off parts removed from the cleaner will return to the cold cleaner. The drainage facility may be external if the District determines that an internal type cannot fit into the cleaning system. [Regulation 6.18, section 4.1.2]
 - (3) A permanent, conspicuous label summarizing the operating requirements shall be installed on or near the cold cleaner. [Regulation 6.18, section 4.1.3]
 - (4) If used, the solvent spray shall be a fluid stream, not a fine, atomized, or shower type spray, at a pressure that does not cause excessive splashing. Flushing of parts using a flexible hose or other flushing device shall be performed only within the freeboard area of the cold cleaner. Solvent flow shall be directed downward to avoid turbulence at the air-solvent interface and to prevent solvent from splashing outside the cold cleaner. [Regulation 6.18, section 4.1.4]
 - (5) Work area fans shall be located and positioned so that they do not blow across the opening of the cold cleaner. [Regulation 6.18, section 4.1.6]
 - (6) If a pump-agitated solvent bath is used, then the agitator shall be operated to produce no more than a rolling motion of solvent with no observable splashing of the solvent against the tank walls of the parts being cleaned. An air-agitated solvent bath shall not be used. [Regulation 6.18, section 4.1.7]
 - (7) The solvent-containing portion of the cold cleaner shall be free of all liquid leaks. Auxiliary cold cleaner equipment such as pumps, water separators, steam traps, or distillation units shall not have any visible liquid leaks, visible tears, or cracks. [Regulation 6.18, section 4.1.8]

- iii. The owner or operator shall observe at all times the following operating requirements: [Regulation 6.18, section 4.2]
 - (1) Waste solvent shall neither be disposed of nor transferred to another party in a manner such that more than 20% by weight of the waste solvent can evaporate. Waste solvent shall be stored only in a covered container. A covered container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container. [Regulation 6.18, section 4.2.1]
 - (2) The solvent level in the cold cleaner shall not exceed the fill line. [Regulation 6.18, section 4.2.2]
 - (3) The cold cleaner shall be closed whenever a part is not being handled in the cold cleaner. [Regulation 6.18, section 4.2.3]
 - (4) Parts to be cleaned shall be racked or placed into the cold cleaner in a manner that will minimize drag-out losses. [Regulation 6.18, section 4.2.4]
 - (5) Cleaned parts shall be drained for at least fifteen (15) seconds or until dripping ceases, whichever is longer. Parts having cavities or bling holes shall be tipped or rotated while the part is draining. During the draining, tipping, or rotating, the parts shall be positioned so that the solvent drains directly back to the cold cleaner. [Regulation 6.18, section 4.2.5]
 - (6) A spill during solvent transfer shall be cleaned immediately, and the wipe rags or other sorbent material shall be immediately stored in a covered container for disposal or recycling, unless enclosure storage of these items is not allowed by fire protection authorities. [Regulation 6.18, section 4.2.6]
 - (7) Sponges, fabric, wood, leather, paper products, and other sorbent material shall not be cleaned in a cold cleaner. [Regulation 6.18, section 4.2.7]
- iv. The owner or operator shall not operate a cold cleaner using a solvent with a vapor pressure that exceeds 1.0 mm Hg (0.019 psi) measured at 20°C (68°F). [Regulation 6.18, 4.3.2]

S2. Monitoring and Record Keeping
[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

a. VOC

- i. See Plantwide emission unit.

- ii. The owner or operator shall maintain records that include the following for each purchase: [Regulation 6.18, section 4.4.2]
 - (1) The name and address of the solvent supplier;
 - (2) The date of the purchase,
 - (3) The type of solvent, and
 - (4) The vapor pressure of the solvent measure in mmHg at 20°C (68°F)

S3. Reporting

[Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition G12:

a. VOC

- i. See Plantwide emission unit.

Attachment A - Calculation Methods and Emission Factors

To calculate actual emissions for any emission unit, the following emission factors and calculation methodology shall be used unless other methods or emission factors are approved in writing by the District.

Unit ID	Emission Point Description	Pollutant	Calculation Method	Emission Factors	Control Device & Efficiency	Notes
U1	E1, E2, E3, E5, E30 – flexographic presses	PM/PM ₁₀	PM/PM ₁₀ (lbs) = (scrap weight, ¹⁰ lbs) (0.1%)	0.1% of scrap	N/A	
		VOC	Mass balance method: VOC (lbs) = (material usage, lbs or gal) VOC content (% or lb/gal)	VOC content per MSDS	N/A	
U2	E8: foam saw	PM/PM ₁₀	PM/PM ₁₀ (lbs) = (material removed, ¹¹ lbs) (31.0%) (1 – 75%)	31.0% of saw dust	75%, Dust collector	
	E9: baler E31: cutter	PM/PM ₁₀	PM/PM ₁₀ (lbs) = (scrap weight, lbs) (0.1%)	0.1% of scrap	N/A	
IA1	E10: band saw E15: foam saw E16: band saw E17: band saw	PM/PM ₁₀	PM/PM ₁₀ (lbs) = (material removed, lbs) (31.0%)	31.0% of saw dust	N/A	
	E11: splitter E12: splitter	PM/PM ₁₀	PM/PM ₁₀ (lbs) = (material removed, lbs) (2.6%)	2.6% of saw dust	N/A	
	E13: die cutter E18: die cutter	PM/PM ₁₀	PM/PM ₁₀ (lbs) = (scrap weight, lbs) (0.1%)	0.1% of scrap	N/A	
IA2	E19: gluer E21: laminator E22: gluing E23: gluing E24: laminator E25: laminator E32: glue gun	VOC	Mass balance method: VOC (lbs) = (material usage, lbs or gal) (VOC content, % or lb/gal)	VOC content per MSDS	N/A	
IA3	E28: parts washer	VOC	Mass balance method: VOC (lbs) = (material usage, lbs or gal) (VOC content, % or lb/gal)	VOC content per MSDS	N/A	
	Oil storage drums	VOC	Use EPA TANK4.0 Program, Or Use PTE: 5.0E-6 tpy for each drum	N/A	N/A	

¹⁰ “Scrap weight” is the scrap (waste material) collected after the processing. It can be calculated by:

Scrap weight (lbs) = (weight of raw material, lbs) – (weight of product, lbs)

¹¹ “Material removed” is the material removed by blade (saw dust). It can be calculated by:

Material removed (lbs) = (total cutting length, ft)(board thickness, ft)(blade thickness, ft)(density, lb/ft³)

Fee Comment

1. The source is required to pay annual fees.
2. In accordance with the Schedule of Fees table, Regulation 2.08, section 12.9.6, the administrative permit revision fee for a FEDOOP source is \$545.74.